

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

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| In re: Rayshell D Fitzgerald Debtor National Cooperative Bank, N.A. Movant v. Rayshell D Fitzgerald Debtor/Respondent SCOTT F. WATERMAN, Esquire Trustee/Respondent | Bankruptcy No. 23-10686-amc Chapter 13 Hearing Date: April 24, 2024 Hearing Time: 11:00 A.M. Location: 900 Market Street, Suite 400 Philadelphia, PA 19107 Courtroom Number #4 |
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NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

National Cooperative Bank, N.A. has filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. §362(d)(1); for costs and disbursements of this action, and for such other and further relief as to the Court may deem just and proper.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the motion, then on or before April 4, 2024, you or your attorney must filed a response to the Motion. (see Instructions on next page).**

- (a) File an answer explaining your position at: 900 Market Street, Suite 400 Philadelphia, PA 19107.

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough that it will be received on or before the dates stated above; and

- (b) Mail a copy to the movant's attorney:

Michelle L. McGowan, Esquire
13010 Morris Rd., Suite 450
Alpharetta, GA 30004

Telephone: 470-321-7112

Email: mimcgowan@raslg.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
3. **A hearing on the Motion** is scheduled to be held before **Judge Ashely M. Chan** on **April 24, 2024, at 11:00 A.M. in Courtroom Number #4, United States Bankruptcy Court, 900 Market Street, Suite 400 Philadelphia, PA 19107.** Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing.**
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's Office in Philadelphia at 215-408-2800 or Reading at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

Dated: March 20, 2024

**Robertson, Anschutz, Schneid, Crane
& Partners, PLLC**

Attorney for Secured Creditor

13010 Morris Rd., Suite 450

Alpharetta, GA 30004

Telephone: 470-321-7112

By: /s/ Michelle L. McGowan

Michelle L. McGowan

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